

CONFIDENTIAL

<p style="text-align: right;">Page 86</p> <p>1 question.</p> <p>2 Have you personally reviewed your Google</p> <p>3 account to determine whether you presently have</p> <p>4 access to any "Making a Murderer" notes through</p> <p>5 Google Docs?</p> <p>6 A. So recently, no. At the time of the</p> <p>7 request, when the request came in, we did review our</p> <p>8 account.</p> <p>9 Q. And when you did that review, did you</p> <p>10 discover that there are any active Google Docs in</p> <p>11 electronic form that you can access through Google?</p> <p>12 A. I don't recall that.</p> <p>13 Q. To your knowledge, if any Google Docs</p> <p>14 were created by you relating to "Making a Murderer"</p> <p>15 for notes specifically, would they still be retained</p> <p>16 on your Google account?</p> <p>17 A. I don't know as it relates to this.</p> <p>18 Q. There was no time at which you went and</p> <p>19 specifically purged Google Docs notes related to</p> <p>20 "Making a Murderer," correct?</p> <p>21 A. Correct.</p> <p>22 Q. Directing your attention forward to the</p> <p>23 document in Exhibit 5 that starts with the</p> <p>24 Bates-stamp NFXCOL 208 in the lower right-hand</p> <p>25 corner.</p>	<p style="text-align: right;">Page 88</p> <p>1 as drafted by you relate to "Making a Murderer"</p> <p>2 Episode 1, Cut 1; is that correct?</p> <p>3 A. I don't know. I'm just seeing the</p> <p>4 e-mail. I'm not -- I'm not sure if it's Cut 1 or</p> <p>5 not.</p> <p>6 Q. Directing your attention, then, to</p> <p>7 NFXCOL 132, the next page after that series in</p> <p>8 Exhibit 5.</p> <p>9 MS. WALKER: Do you mean 1932?</p> <p>10 MS. BARKER: I'm sorry. Yes. Thank you.</p> <p>11 Q. (BY MS. BARKER): Directing your</p> <p>12 attention to NFXCOL 1932 in Exhibit 5, do you see</p> <p>13 that?</p> <p>14 A. I do.</p> <p>15 Q. And that is a copy of an e-mail message</p> <p>16 from Marjon Javadi to Lisa Dennis, dated</p> <p>17 November 20th, 2014 -- correct?</p> <p>18 A. That looks correct.</p> <p>19 Q. You are copied on that e-mail message,</p> <p>20 correct?</p> <p>21 A. That looks correct.</p> <p>22 Q. And the message states that feedback on</p> <p>23 the first four episodes are attached, correct?</p> <p>24 A. That looks correct.</p> <p>25 Q. Directing your attention to NFXCOL 1933</p>
<p style="text-align: right;">Page 87</p> <p>1 A. Yep.</p> <p>2 Q. If you would take just a moment and</p> <p>3 review that, I think it runs through NFXCOL 210. I'm</p> <p>4 sorry.</p> <p>5 A. Okay.</p> <p>6 Q. So the document Bates-stamped NFXCOL 208</p> <p>7 is a copy of an e-mail message from Marjon to you</p> <p>8 indicating that she would put notes into the "Making</p> <p>9 a Murderer" notes for you, correct?</p> <p>10 A. Yeah. I'm -- I'm asking her, yeah, to</p> <p>11 place these in the "Murderer" notes.</p> <p>12 Q. Was there one overarching Google Docs</p> <p>13 that covered -- Google document that covered all of</p> <p>14 the "Making a Murderer" notes for all episodes?</p> <p>15 A. No.</p> <p>16 Q. And the notes that -- strike that.</p> <p>17 The comments which were drafted by you</p> <p>18 as notes in NFXCOL 208 through NFXCOL 210 start with</p> <p>19 the message about halfway down the page on NFXCOL 208</p> <p>20 in -- preceded by an e-mail message from you to</p> <p>21 yourself dated November 3rd, 2014, correct?</p> <p>22 A. Correct.</p> <p>23 Q. And the notes that are shown there,</p> <p>24 wherefore, are related to and -- strike that.</p> <p>25 The notes that are shown on those pages</p>	<p style="text-align: right;">Page 89</p> <p>1 through NFX 1941, you can take a moment and look</p> <p>2 through those, please.</p> <p>3 A. Okay.</p> <p>4 Q. So the documents at NFXCOL 1933 through</p> <p>5 1941 are the "Making a Murderer" notes for Episodes</p> <p>6 1, 2, 3, and 4, as referenced in the preceding e-mail</p> <p>7 message, correct?</p> <p>8 A. That looks correct.</p> <p>9 Q. And to your understanding, in the "To"</p> <p>10 line on page NFXCOL 1933, when it refers to "Making a</p> <p>11 Murderer Creative," who all is included in that?</p> <p>12 A. I don't know. It depends on -- it</p> <p>13 looks, based on the e-mail, that the cover letter --</p> <p>14 that it would have been Lisa Nishimura, myself, and</p> <p>15 Marjon at that time.</p> <p>16 Q. With respect to the notes that are</p> <p>17 represented by NFXCOL 1933 through 1941, was -- do</p> <p>18 you know specifically who drafted each note other</p> <p>19 than looking at other documents or is this a group</p> <p>20 effort?</p> <p>21 A. I don't recall.</p> <p>22 Q. Did you at the time review the notes</p> <p>23 that are represented at NFXCOL 1933 through 1941?</p> <p>24 A. I don't recall.</p> <p>25 Q. Normally in your work on the series, you</p>

